

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$803,150 in U.S. Currency,

Defendant *in rem*.

NO. 3:25-MC-35

**UNOPPOSED MOTION TO EXTEND  
TIME TO FILE JUDICIAL FORFEITURE ACTION**

The United States of America—with consent from Claimant Maxwell Schlesinger through his attorney Arnold Spencer—authorized by 18 U.S.C. § 983(a)(3)(A), moves the Court to extend the time in which the United States is required to file a complaint for civil judicial forfeiture from June 9, 2025, to July 9, 2025, regarding property to which a claim has been filed by the claimant in an administrative forfeiture proceeding with the United States Customs and Border Protection (“CBP”), and in support states:

1. The seized property in the custody of the CBP is described as \$803,150 in U.S. Currency (“the property”).
2. On January 27, 2025, CBP agents seized the property from Maxwell Schlesinger at the Dallas Love Field Airport.
3. The CBP has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to interested parties.
4. Maxwell Schlesinger filed an administrative claim on March 11, 2025.

5. According to 18 U.S.C. § 983(a)(3), the United States is to file a judicial forfeiture action no later than 90 days after an administrative claim has been filed or return the seized property pending such filing, except that a court may extend the filing period for good cause shown or upon agreement of the parties.

6. Pursuant to 19 U.S.C. §§ 1603–04, the seizing agency transmitted the claim to the United States Attorney’s Office to pursue a judicial forfeiture action against the property.

7. Unless the Court extends the judicial filing deadline for good cause or upon agreement of the parties, the 90-day period that began with the claim filed by Maxwell Schlesinger expires on June 9, 2025.

8. The parties have agreed to extend the time for filing a judicial action to and including July 9, 2025. The United States requests an order of court to extend the time for filing a judicial action to and including July 9, 2025, to allow additional time for the parties to explore an agreed early resolution of this matter.

#### Conclusion

Therefore, the United States requests an order to extend the filing period for a judicial forfeiture action as to the seized property, \$803,150 in U.S. Currency, to and including July 9, 2025.

Respectfully submitted,

NANCY E. LARSON  
ACTING UNITED STATES ATTORNEY

/s/ John Penn

JOHN PENN

Assistant United States Attorney

Indiana Bar No. 28722-29

1100 Commerce Street, Suite 300

Dallas, Texas 75242

Telephone: 214-659-8600

Facsimile: 214-659-8805

Email: john.penn@usdoj.gov

**CERTIFICATE OF CONFERENCE**

This is to certify that I have conferred with counsel for Claimant Maxwell Schlesinger, Arnold Spencer, and understand he is not opposed to the relief sought by this motion.

/s/ John Penn

John Penn

Assistant United States Attorney